



June 28, 2013

U.S. Environmental Protection Agency
Mailcode 28221T
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Re: Comments of Bristol Bay Native Corporation on EPA's Revised Draft Bristol Bay Watershed Assessment, Docket ID No. EPA-HQ-ORD-2013-0189

Dear EPA:

Please accept the attached comments of the Bristol Bay Native Corporation (BBNC) on the Revised Draft Bristol Bay Watershed Assessment. BBNC thanks the U.S. Environmental Protection Agency (EPA) for preparing the Second External Review Draft of the Bristol Bay Watershed Assessment ("Revised Assessment").¹ BBNC also appreciates EPA's willingness to take into consideration BBNC's previous comments and technical submittals in revising and strengthening the assessment.

The Revised Assessment improves upon the Draft Watershed Assessment that was released to the public in 2012. The Revised Assessment provides the agency and the public with a more comprehensive understanding of the fishery and water resources of Bristol Bay and the risks posed to those resources by large-scale hard rock mining. Once finalized, it will inform future decision-making at all levels.

In light of the overwhelming risks documented in the Revised Assessment, BBNC respectfully urges EPA to expeditiously complete a Final Assessment and reiterates its request that EPA utilize its authority under Section 404(c) of the Clean Water Act (CWA) to protect the fishery and water resources of Bristol Bay and the people, businesses, and communities who depend on them. BBNC continues to advocate for EPA's 404(c) action to consist of reasonable performance standards applicable to any efforts to mine the Pebble Deposit and other equally-large mining development in the Nushagak and Kvichak watersheds. Specifically, EPA should

¹ EPA, *An Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, Alaska*, Second External Review Draft, EPA 910-R-12-004Ba (April 2013) [hereafter "Revised Assessment"], available at http://www.epa.gov/ncea/pdfs/bristolbay/bristol_bay_assessment_erd2_2013_vol1.pdf.

require that any dredge and fill permits for such development prohibit the discharge of mine waste into salmon habitat, that is toxic to aquatic life, or that will cause run-off or seepage that requires treatment in perpetuity.

Thank you for the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Tiel Smith', is written over a horizontal line. The signature is stylized with a large, sweeping flourish extending to the right.

L. Tiel Smith

Vice President of Land and Regional Operations